

MICHAEL A. CARDOZO Corporation Counsel

## THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET NEW YORK, NY 10007

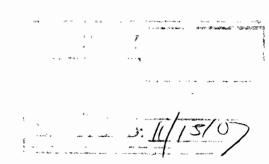
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November 14, 2007

## BY HAND DELIVERY

Honorable Shira A. Scheindlin United States District Judge Southern District of New York 500 Pearl Street, Room 1620 New York, New York 10007



Re: Dones v. City of New York, et al. 07 CV 3085 (SAS) (GWG)

## Dear Judge Scheindlin:

I am the Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York assigned to defend the above-referenced matter. I write on behalf of plaintiff and defendants to request an extension of the discovery period and the time to conduct depositions in this case. At present, the parties' time to conduct depositions expired on Monday, November 12, 2007 and discovery is set to close on December 10, 2007. By letter dated November 9, 2007, the parties made this joint request for an extension of time to Magistrate Judge Gorenstein, but were notified on November 13, 2007 that the parties should seek an extension from Your Honor.

Due to changes in lead attorneys for both plaintiff and defendants, and scheduling conflicts between counsel, the parties were unable to conduct depositions prior to November 12, 2007. Moreover, defendants are awaiting plaintiff's responses to their interrogatories and document requests, which were served on plaintiff on August 10, 2007. Plaintiff has informed defendants they will provide responses as soon as possible. This is the parties' first request for an extension of their time to conduct depositions and of the discovery period. As such, the parties request until January 14, 2008 to complete discovery in this case, including depositions.

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The parties also respectfully request that the final pre-trial conference, currently scheduled for December 21, 2007, be adjourned to a date and time that is convenient to the Court after the new proposed discovery deadline. This request does not modify or change any other deadline set forth in the June 11, 2007 scheduling Order.

I thank the Court for its attention to this matter.

Respectfully submitted,

Carolyn Walker-Diallo

**Assistant Corporation Counsel** 

Linda M. Cronin, Esq. c: (By Facsimile)

The parties' request is granted. The deadling for discovery is hereby extended to January 14, 2008. The conference previously scheduled for Vecenber 21, 2007 is adjusted to January : 22, 2008, at 4:30 pm.

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